



1833

BANCO
CARREGOSA

Assessment Procedure for
the Regulatory
Compliance Plan

November-2025

V. 1.1

< This page intentionally left blank >

Table of Contents

I. Versions Index	v
II. Properties.....	v
III. Legislative Sources and Reference Documents.....	vii
IV. Definitions, Abbreviations, and Acronyms	vii
A. Scope and Objective.....	1
A.1. Plan for the Prevention of Risks of Corruption and Related Offences.....	1
A.2. Code of Conduct.....	1
A.3. Channel for the Reporting of Irregularities	1
A.4. Training Plan	2
B. Assessment of the Implementation Status and Effectiveness of the Regulatory Compliance Plan.....	3

< This page intentionally left blank >

Assessment Procedure for the Regulatory Compliance Plan

Board of Directors

I. Versions Index

Date	Version	Description
Nov.2022	1.0	Creation of document.
Nov.2025	1.1	Update Section III. Legislative Sources and Reference Documents and Section IV. Definitions, Abbreviations, and Acronyms. Add a reference to the mandatory publication and dissemination of the PPR to MENAC in Section A.1. Plan for the Prevention of Risks of Corruption and Related Offences. Addition to the BoD's competences regarding the reporting of irregularities in A.3. Channel for Reporting Irregularities. Complete upgrade of Section A.4. Training Plan. Create a section on B. Assessment of the Degree of Implementation and Effectiveness of the Regulatory Compliance Plan. Remove the currently non-applicable Section B. Transitional and Final Provisions.

II. Properties

Proprietorship

Board of Directors

Proponent

Compliance Department

Contributors

Supervisory Committee and Risk Department

Approval

Board of Directors, on 25 November 2025

Banco Carregosa Code

Support Processes | 4.03.10

Entry into effect

26 November 2025

Scope of Disclosure

Public

Revision Frequency

Every 3 years

III. Legislative Sources and Reference Documents

1.12 – Outsourcing Policy.

1.52 – Plan for the Prevention of Risks of Corruption and Related Offences.

1.59 – Training and Competence Development Policy.

2.01 – Code of Conduct.

2.09 – Policy on the Reporting of Irregularities.

Decree-Law No. 109-E/2021 of 9 December, establishing the legal framework for the prevention of corruption.

IV. Definitions, Abbreviations, and Acronyms

Bank: Banco L. J. Carregosa, S.A..

BoD: Board of Directors.

EC: Executive Committee.

SC: Supervisory Committee.

IAD: Internal Audit Department.

CD: Compliance Department.

PCD: People and Culture Department.

RD: Risk Department.

RACCP: Regulatory Anti-Corruption Compliance Plan.

PPR: Plan for the Prevention of Risks of Corruption and Related Offences.

MENAC: National Anti-Corruption Mechanism.

CO: Compliance Officer.

RGPC: MENAC online platform.¹

¹ <https://entidade.mec-anticorruptao.pt/>

A. Scope and Objective

1. This Procedure outlines how the Banks' Plan will be assessed.
2. The Bank's Plan consists of the following documents:
 - i. the Plan for the Prevention of Risks of Corruption and Related Offences;
 - ii. the Code of Conduct;
 - iii. the Training Plan;
 - iv. the Channel for Reporting Irregularities.

A.1. Plan for the Prevention of Risks of Corruption and Related Offences

3. The BoD is responsible for approving the Plan for the Prevention of Risks of Corruption and Related Offences, with the CD as proponent and the RD and SC as contributors.
4. As the Bank's Compliance Officer, and as RCN for the prevention of corruption and related offences, the head of the CD is responsible for ensuring and monitoring the implementation of the Plan.
5. The CD is responsible for:
 - i. preparing the mid-term assessment report on the identified situations of high or maximum risk, to be submitted to the BoD in October. This report is published on the Bank's website and communicated to the Employees and MENAC (through the PPR platform) within 10 business days of its preparation.
 - ii. preparing the annual assessment report, which will quantify the degree of implementation of the preventive and corrective measures identified and will provide a forecast for their implementation. The report will be submitted to the BoD in April of the following year relating to the period in question.
6. The PPR must be reviewed every three years, or whenever a change is required.

A.2. Code of Conduct

7. The BoD shall be responsible for approving the Code of Conduct, after hearing the CD and the SC.
8. The BoD shall ensure that the Code is reviewed at regular intervals, to be carried out at least every two years and whenever changes in legislation and and/or regulations justify it.
9. At least every three years, the BoD shall hire an external entity to analyse the institution's conduct and values, as well as those of the BoD and its supporting bodies.
10. The CD shall assess the conformity and completeness of the Code at least every two years and submit the results of its analysis to the BoD and the SC.
11. Every three years, the SC shall promote periodic and independent assessments of its conduct and values, in conjunction with the assessments set out in paragraph 9.

A.3. Channel for the Reporting of Irregularities

12. To ensure a channel for reporting irregularities, the BoD of Banco Carregosa established a policy, 2.09 – Policy on the Reporting of Irregularities –, after consulting the CD and the SC.
13. The BoD shall also be responsible for:
 - i. ensuring that the Policy in question is reviewed periodically at least every two years, without prejudice to reviews whenever justified by legal or regulatory changes;

- ii. Ensure that all Employees are expressly aware of the policy. Guarantee that training activities organised by the Bank are carried out with the help of the CC and the PCD.
- 14. The SC shall be responsible for analysing reports of irregularities, unless they concern the SC itself or any of its members.
- 15. The CD is the structural unit responsible for monitoring the implementation of the autonomous procedure for reporting irregularities, in articulation with the SC. It also ensures that all reports are recorded in a proper database and analysed.
- 16. The IAD shall assess the quality of the IT system for reporting irregularities at least every three years. This analysis shall include quality control and a review of general IT contracts, as well as ensuring conformity of the IT system with the applicable legislation, regulations and internal Bank rules.

A.4. Training Plan

- 17. Banco Carregosa's training plan is structured into three documents:
 - i. Training Plan for Members of the Board of Directors;
 - ii. Training Plan for the Supervisory Committee;
 - iii. Training Plan for other Employees.
- 18. Banco Carregosa's Training Plans aim to fulfil the provisions of the Training and Competence Development Policy. The BoD and the SC are responsible for approving their respective training plans, while the EC is responsible for approving the training plan for the remaining employees, based on a proposal from the PCD and after hearing the views of the CD.
- 19. The Training Plans for the members of the Board of Directors and of the Supervisory Committee are multi-annual and must be reviewed each year.
- 20. In turn, the Training Plan for the remaining Employees is presented every year. It provides for mid-term reviews and updates and includes the Mandatory Training Plan referred to in the Training and Competence Development Policy, and the Training Plan for Internal Control Functions. It also establishes the general guidelines for defining and implementing the Technical Training Plan across all units for the remaining Employees.
- 21. The Compulsory Training Plan also considers Tied Agents, whose responsibilities in this area are controlled by the Bank.
- 22. Alongside the Plan, mechanisms for oversight have been established to guarantee its monitoring and strict adherence.
- 23. The Bank's Training Plan includes anti-corruption training, taking into account the legal obligations arising from the RGPC.
- 24. Regarding the training on regulatory requirements as part of the HACCP, it should be noted that:
 - i. Paragraph 13 of 2.01 – Code of Conduct and Article 3(1)(iv) of 1.04 – Regulations of the Board of Directors establish that knowledge of the essential principles and rules of conduct that underpin the Bank's activity must be acquired before taking up office and updated periodically through training sessions provided by the Bank;
 - ii. Paragraph 5 of 2.09 – Policy on the Reporting of Irregularities establishes that the BoD is responsible for ensuring that all Bank Employees are made aware of the Policy in question. With the help of the CD and the PCD, the BoD shall ensure that the Bank's training sessions are carried out;

- iii. 1.52 – Plan for the Prevention of Risks of Corruption and Related Offences, in the section on Training and Communication, sets out the training plan guidelines for MOAFs and employees. These guidelines take into account the different types of exposure to the identified risks, as well as the key topics to be covered in the training sessions.

B. Assessment of the Implementation Status and Effectiveness of the Regulatory Compliance Plan

- 25. Banco Carregosa confirms that it possesses the necessary internal information, as well as the human and technical resources, to ensure the effectiveness of:
 - i. compliance with the policies included in the RACCP and with its defined objectives, as well as compliance with legal and regulatory provisions;
 - ii. the prevention and detection of corruption and related offences, in accordance with 1.52 – Plan for the Prevention of Risks of Corruption and Related Offences.
- 26. As mentioned in paragraph 4., the CO is responsible for ensuring and monitoring the application of the RACCP in an independent, permanent and autonomous manner. In this regard, it is responsible for:
 - i. providing an annual assessment of the degree of implementation of the preventive and corrective measures, as well as a forecast for their implementation;
 - ii. a mid-term assessment of situations identified as being at high or maximum risk of corruption;
 - iii. implementing prior risk assessment procedures with regard to third parties acting on behalf of the Bank, suppliers and customers, and for keeping a record of the third parties analysed and the results of the due diligence carried out.
- 27. In addition, to assess the adequacy and effectiveness of the RACCP, the Bank regularly monitors the implementation of the internal control system. This is done by carrying out random audits and reporting the results and any constraints. The Bank then implements the necessary corrective or improvement measures.

